

1 SQUIRE, SANDERS & DEMPSEY L.L.P.
Mark C. Goodman (State Bar No. 154692)
2 David A. Gabianelli (State Bar No. 158170)
Julie E. Schwartz (State Bar No. 260624)
3 One Maritime Plaza, Suite 300
San Francisco, CA 94111
4 Telephone: +1.415.954.0200
Facsimile: +1.415.393.9887
5 Email: mgoodman@ssd.com
Email: dgabianelli@ssd.com
6 Email: jeschwartz@ssd.com

7 Attorneys for Defendants
BAYER CORPORATION,
8 BAYER HEALTHCARE LLC,
BAYER HEALTHCARE PHARMACEUTICALS INC. and
9 MCKESSON CORPORATION

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 LYNZEE LABORDE, an individual,

14 Plaintiff,

15 vs.

16 MCKESSON CORPORATION; BAYER
CORPORATION; BAYER HEALTHCARE
17 LLC; BAYER PHARMACEUTICALS
CORPORATION; BAYER HEALTHCARE
18 PHARMACEUTICALS INC., BERLEX
LABORATORIES, INC., BERLEX, INC.;
19 BAYER SCHERING PHARMA AG;
BAYER AG; and DOES 1-10, inclusive,
20

21 Defendants.
22
23
24
25
26
27
28

Case No. CV 10-548 VRW

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT**

1 Plaintiff Lynzee Laborde (“Plaintiff”) and Defendants Bayer Corporation, Bayer
2 HealthCare LLC, Bayer HealthCare Pharmaceuticals Inc. and McKesson Corporation
3 (collectively, “Defendants”) by and through their respective counsel, enter into the following
4 Stipulation:

5 WHEREAS, Plaintiff’s Complaint was filed on February 8, 2010;

6 WHEREAS, Defendants issued a letter dated February 10, 2010 identifying this matter as
7 a tag-along action in connection with MDL No. 2100 pending in the United States District Court
8 for the Southern District of Illinois;

9 WHEREAS, responses currently are due from Defendants on March 16, 2010; and

10 WHEREAS, an extension of time to respond to the Complaint is warranted for counsel to
11 discuss the disposition of this case and attempt to reach agreement on how it will be handled
12 going forward.

13 NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE,
14 Defendants shall have until March 30, 2010 to respond to Plaintiff’s Complaint.

15 IT IS SO STIPULATED.

16
17 Dated: March 10, 2010

18 ROBINSON, CALCAGNIE & ROBINSON

SQUIRE, SANDERS & DEMPSEY LLP

19
20 By: /s/ Daniel Robinson
21 DANIEL ROBINSON

By: /s/ Julie E. Schwartz
JULIE E. SCHWARTZ

22 Attorneys for Plaintiff
23 LYNZEE LABORDE

Attorneys for Defendants
BAYER CORPORATION,
BAYER HEALTHCARE LLC,
BAYER HEALTHCARE
24 PHARMACEUTICALS INC. and
25 MCKESSON CORPORATION

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2
3 DATED: 3/15/2010

